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Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

SIERRA CLUB, a non-profit corporation,
**NORTHWEST ENVIRONMENTAL
DEFENSE CENTER**, a non-profit
corporation, **FRIENDS OF THE
COLUMBIA GORGE**, a non-profit
corporation, **COLUMBIA RIVERKEEPER**,
a non-profit corporation, and **HELLS
CANYON PRESERVATION COUNCIL**, a
non-profit corporation,

Civil No.: 08-1136-HA

**PLAINTIFFS' MOTION FOR LEAVE TO
FILE FIRST AMENDED COMPLAINT**

(Pursuant to Fed. R. Civ. P. 15(a)(2))

Plaintiffs,

v.

**PORTLAND GENERAL ELECTRIC
COMPANY**, an Oregon Corporation,

Defendant.

Pursuant to Local Rule 7.1, the parties have conferred through counsel regarding the subject matter of Plaintiffs' motion and have been unable to resolve their dispute.

Pursuant to Federal Rule of Civil Procedure 15(a)(2), and for the reasons set forth in the accompanying Memorandum in Support of Plaintiffs' Motion for Leave to File First Amended Complaint, Plaintiffs respectfully request the Court for leave to amend their initial complaint to plead facts pertaining to subsequently discovered alterations of the Boardman boiler. Plaintiffs' proposed First Amended Complaint, attached as Exhibit 1, includes changes to paragraphs 134; 161-165; and 232.

DATED: November 1, 2010

Respectfully submitted,

/s/ Aubrey Baldwin
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